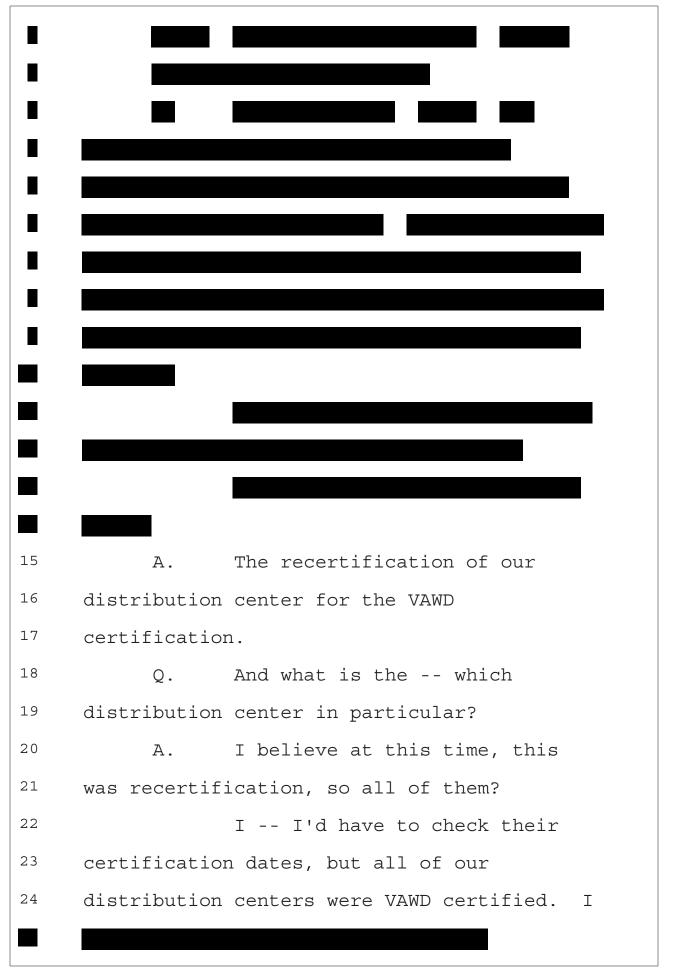
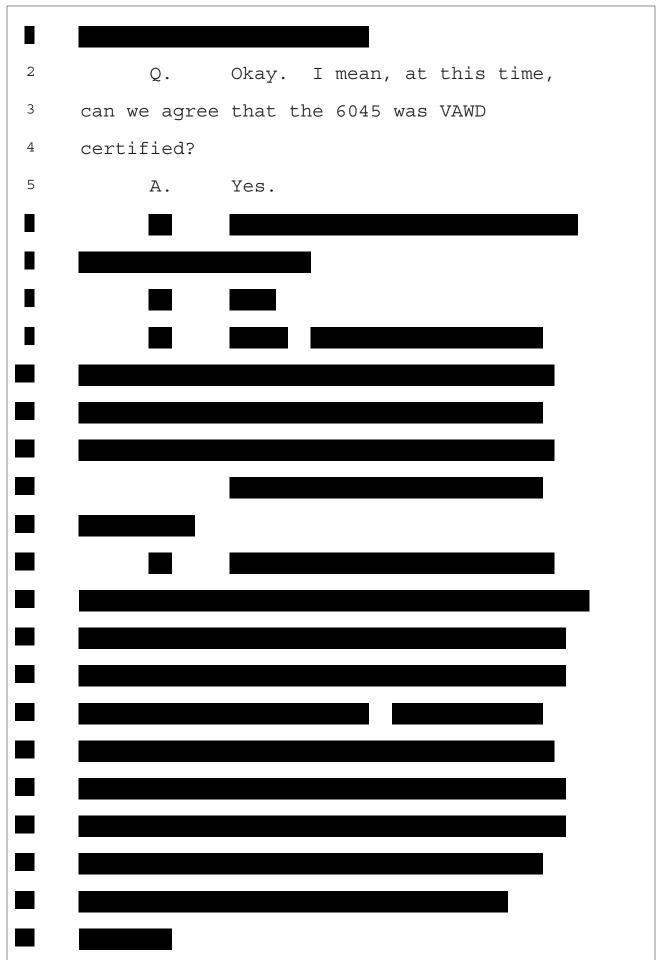
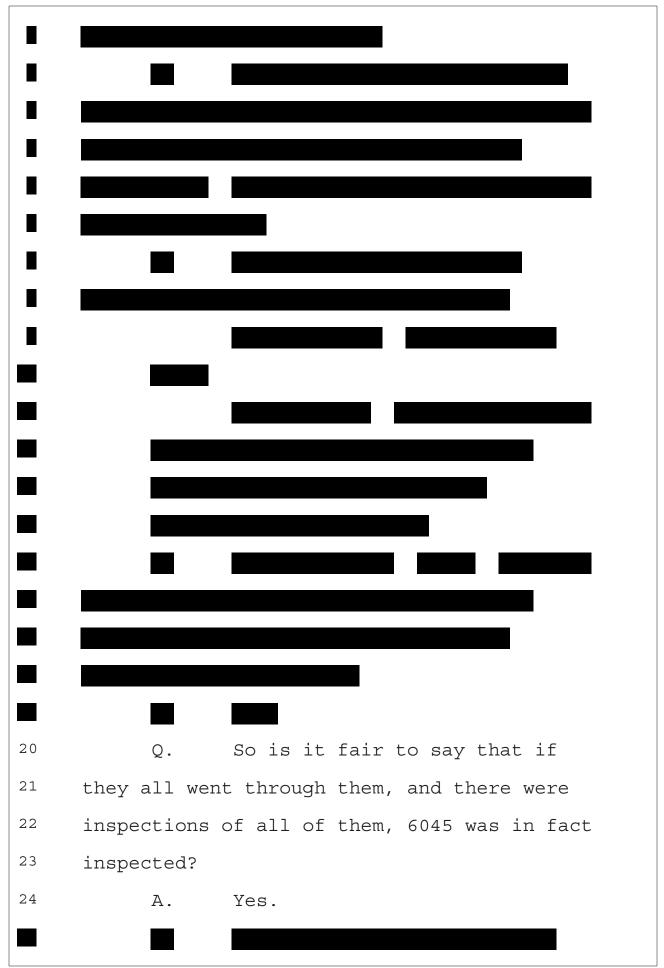
EXHIBIT E

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1
              UNITED STATES DISTRICT COURT
            FOR THE NORTHERN DISTRICT OF OHIO
2
                   EASTERN DIVISION
3
                                    MDL No. 2804
    IN RE: NATIONAL
    PRESCRIPTION OPIATE
    LITIGATION,
                                    Case No.
                                    1:17-MD-2804
5
    THIS DOCUMENT RELATES TO
                                ) Hon. Dan A.
6
    ALL CASES
                                    Polster
7
8
9
              Wednesday, January 23, 2019
10
       HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
11
                 CONFIDENTIALITY REVIEW
12
13
14
           Videotaped Deposition of SUSANNE
15
     HILAND, held at 4206 South J.B. Hunt Drive,
16
     Rogers, Arkansas, commencing at 8:25 a.m., on
     the above date, before Debra A. Dibble,
     Certified Court Reporter, Registered
17
     Diplomate Reporter, Certified Realtime
18
     Captioner, Certified Realtime Reporter and
     Notary Public.
19
20
21
22
                GOLKOW LITIGATION SERVICES
23
             877.370.3377 ph | fax 917.591.5672
                     deps@golkow.com
24
25
```

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1
            reporter today is Debbie Dibble and
 2.
            she will now please swear in the
 3
            witness.
 4
                    SUSANNE HILAND,
 5
     having first been duly sworn, was examined
 6
     and testified as follows:
 7
                   DIRECT EXAMINATION
 8
     BY MR. INNES:
 9
                   Good morning, Ms. Hiland.
10
     name is Michael Innes. We met yesterday,
11
     where you sat as a corporate designee for
12
     Walmart and provided testimony.
13
                   Some of the questions I'm going
14
     to ask you up front might sound redundant as
15
     to the questions you were asked yesterday,
16
     but I want to have a complete record.
17
     I'll preface all of my questions with -- with
18
     that.
19
                   You do understand you're under
20
     oath today; right?
21
            Α.
                   Yes.
22
                   And you might have to speak up
            Ο.
23
     for the folks to hear on the phone. I know
24
     yesterday there were some complaints after
25
     that it was difficult to hear all of us in
```







(BY MR. INNES) Did you come to Ο. learn what VAWD would consider to be 9 10 acceptable programs? 11 Α. Our pharmacy -- our 12 distribution centers were reaccredited. 13 we would have met the criteria required by 14 the VAWD certification. At no time in this 15 process were we unaccredited. The point of 16 this was to make sure that we were prepared 17 and had as much information as possible to 18 prepare for that recertification process. 19 How long did that 20 recertification process take? 21 I think in this case there Α. 22 was -- I think there were some delays as 23 we -- again, because there were additional 24 documentation requirements. I don't remember 25 specifically what those were. I think it was

```
1
     a longer recertification process in this time
2.
     frame.
3
            Ο.
                   What do you mean by
4
     "documentation requirements"?
5
                   So documenting practices in --
            Α.
6
     in a policy that could be reflected and
7
     inspected by the VAWD inspector.
8
                   Okay. So at the time of the
            Ο.
9
     reapplication process, did Walmart have its
10
     practices documented in a policy that could
11
     be reviewed by the VAWD inspector?
12
                   MS. TABACCHI: Object to the
13
            form.
14
                   THE WITNESS: As I recall,
            there were -- there were written
15
16
            policies memorialized around practices
17
            that we had in place in this time
18
            frame as a result -- to meet those
19
            recertification -- those new
20
            recertification requirements.
21
                   MS. TABACCHI: Mike, before you
22
            get to another document, can we take
23
            another quick break?
24
                   I just don't want to get -- I
25
            want to catch you before you start
```